

**Baumb, Nelly**

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**From:** Phil Metz <philmetz@gmail.com>  
**Sent:** Monday, August 17, 2020 11:11 AM  
**To:** Council, City  
**Subject:** Oppose: Staff & UAC Recommendations for Amending the City's Electric Supply Portfolio Carbon Neutral Plan

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I urge the City Council to reject the staff recommendations 1) b. and 1) c. to authorize the exchange and purchase of unbundled RECs ("Bucket 3 RECs")

These recommendations focus on electricity revenue and cost, not renewable energy, and by driving us toward greater use of "Bucket 3 RECS" – which do nothing to make our electric energy supply more renewable (which is why Bucket 3 RECs are cheap!) – would actually impede the City's ability to reduce GHGs.

Instead, the City should focus its renewable energy efforts on actually generating renewable energy, reducing energy consumption, as well as on electricity supply resilience and emergency response.

RECs (renewable energy credits) are financial instruments – NOT energy. They do not increase the renewable character of the City's electricity supply. And Bucket 3 RECs do not even need to be associated with electricity scheduled in the same year as the RPS-eligible generation.

([https://www.cpuc.ca.gov/RPS\\_Procurement\\_Rules\\_50/](https://www.cpuc.ca.gov/RPS_Procurement_Rules_50/)) That is why Bucket 3 RECs are disfavored by the State. So, recommendation 1) a. that the City use an hourly carbon emissions standard is bogus if the City seeks to accomplish this by purchasing Bucket 3 recs.

These recommendations are not renewable and do nothing to enhance the resilience of the City's energy supply or our ability to provide energy in an emergency.

We need a renewable energy plan that actually generates renewable energy and reduces electric energy consumption. That will reduce GHG production AND increase resilience and enhance emergency response.

Sincerely,

Phil

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